

# EXHIBIT 1

## FILED UNDER SEAL

**From:** Park, Ryuk <RPark@winston.com>  
**Sent:** Tuesday, April 4, 2023 9:37 AM  
**To:** Tezyan, Michael; Rueckheim, Mike  
**Cc:** Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel; jtruelove@mckoolsmith.com; #Netlist-Micron [Int]  
**Subject:** RE: Micron 203 | P.R. 4-1 Claim Construction Meet and Confer

Michael,

Following up on my email below, and in the spirit of narrowing the dispute, Micron agrees to withdraw the following terms from its Patent Rule 4-1 disclosures:

Patent	Terms
'060 & '160 patents	"not in electrical communication with"
	"control/address signal"
	"data signal"
'054 and '918 patents	"voltage monitor circuit"

Additionally, for the following terms, Micron can agree to adopt the parties' agreed-upon constructions or the court's constructions from the *Netlist v. Samsung*, 21-cv-463 (EDTX) case:

Patent	Terms	Agreed-Up on or Court's Construction
'060 & '160 patents	"A memory package"	The preamble is limiting
	"array die"	"array die that is different from a DRAM circuit"
	"chip select signal" / "chip select conduits"	Plain and ordinary meaning
'506 patent	Preamble of claim 1	The preamble is limiting
'339 patent	Preambles of claims 1, 11, 19, 27	The preamble is limiting
	"in accordance with a latency parameter"	"a time period wherein the start of the time period depends on at least a latency parameter"
	"N-bit wide write data" (claims 1-3, 11, 14)	"write data that is N bits in width"
'054 patent	"operable state" (claims 4-7, 11-12, 16-17, 23, 25-26)	"state in which the memory module is operated"
	"first operable state" (claims 4-7, 11-12, 16-17, 23, 25-26)	"state in which the memory module is operated before transition"
	"second operable state" (claims 4-7, 11-12, 16-17, 23, 25-26)	"state in which the memory module is operated after transition"

Please note that these are Micron's tentative and preliminary positions only. Micron reserves its right to amend or supplement its positions regarding the terms it believes requires constructions and its proposed constructions for such terms.

Thank you and regards,

Ryuk

**Ryuk Park**

**Of Counsel**

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**From:** Tezyan, Michael <mtezyan@irell.com>

**Sent:** Monday, April 3, 2023 11:48 AM

**To:** Park, Ryuk <RPark@winston.com>; Rueckheim, Mike <MRueckheim@winston.com>

**Cc:** Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>

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Yes. I will send you an invite to forward as needed.

Thanks,

**Michael Tezyan**

*Associate*

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**From:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>

**Sent:** Monday, April 3, 2023 11:34 AM

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Michael,

Does 10 am PT work for your team?

Thanks,

Ryuk

**Ryuk Park**

**Of Counsel**

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